

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON NON-REVISION PTO 298
(ELECTION WAVE) CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
DOUGLAS GRIER, M.D. FOR NON-REVISION PTO 298 (ELECTION WAVE)**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to Douglas Grier for Ethicon Wave 1, Dkt. 2022 (motion), Dkt. 2024 (memorandum in support) and Ethicon Wave 3, Dkt. 2982 (reply). Plaintiffs respectfully request that the Court exclude Douglas Grier's testimony, for the reasons expressed in the Wave 1 and 3 briefing. This notice applies to the following Non-Revision PTO 298 (Election Wave) cases identified in Exhibit A attached hereto.

Dated: December 12, 2018

Respectfully submitted,

/s/ D. Renee Baggett
Renee Baggett, Esq.
Bryan F. Aylstock, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell
THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com

EXHIBIT A

Baldwin, Sally Virginia	2:17-cv-03705
Catlett, Brenda Lee	2:14-cv-20668
Courneya, Lisa	2:14-cv-15143
Gomez, Carol	2:13-cv-04561
Hinthorn, Barbara J.	2:14-cv-30023
Jefford, Marianne	2:13-cv-04034
Lambert, Corrie Ann	2:12-cv-02183
Maddux, Teresa	2:12-cv-09883
Manning, Lori	2:17-cv-00775
Muniz, Mary	2:15-cv-14968
Painter, Charlene Marie	2:14-cv-12999
Peele-Rice, Crystal E.	2:13-cv-25754
West, Susan D.	2:12-cv-03855

CERTIFICATE OF SERVICE

I hereby certify that on December 12, 2018, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com